

April 30, 2007

VIA ELECTRONIC FILING

Ms. Carole J. Washburn
Executive Secretary
Washington Utilities and Transportation Commission
1300 S. Evergreen Park Drive SW
Olympia, WA 98504-7250

**Re: Annual Electric Reliability Report per WAC 480-100-393 and
WAC 480-100-398**

Dear Ms. Washburn:

In Docket No. UE-991168 the Commission adopted WAC 480-100-393 and 480-100-398, which are rules associated with developing a reliability monitoring and reporting plan and annually reporting on reliability results for the reporting period identified in the plan. In November 2001, in Docket No. UE-011443, PacifiCorp outlined its reporting plan, which identified and established the Company's reporting period from April 1 through March 31 of the following year, consistent with the Company's fiscal reporting period. The report would be filed by May 31 of each year.

In March 2006, MidAmerican Energy Holdings Company acquired PacifiCorp. During this transaction it was communicated that upon completion of the transaction the Company would transition to a calendar fiscal period, i.e. January 1 through December 31. As a result, PacifiCorp proposes to modify its annual reporting plan to be consistent with this calendar fiscal period, with annual report filings to be completed by May 1 of each year. The Company identified May 1 as a reporting due date since one of the elements that it provides annually in its report is a synopsis of geographic areas of reliability concerns, including plans for study or improvements for system facilities. Thus, sufficient time must be allotted to support a comprehensive analysis across the system to identify these concerns and design plans for study or improvements. Furthermore, this due date is consistent with other reliability plans that the Company prepares as part of compliance with other state Commissions in its service territory.

Additionally, in UE-042131, which was subsequently incorporated into UE-051090, the Commission adopted the Company's proposal to modify its Service Standards Program and eliminated its momentary outage measurement information, due to insufficiency of the data set upon which this measure is calculated. The Company also proposes its annual reporting plan will no longer report this data, due to the same concerns about

quality data that resulted in the elimination of the performance standard measure. This change is reflected in the report enclosed herein.

It is respectfully requested that all formal correspondence and Staff requests regarding this filing be addressed to:

By E-mail (preferred): datarequest@pacificorp.com

By regular mail: Data Request Response Center
PacifiCorp
825 NE Multnomah, Suite 2000
Portland, OR 97232

By fax: (503) 813-6060

Informal questions should be directed to Shay LaBray, Regulatory Manager, at (503) 813-6176.

Sincerely,

A handwritten signature in black ink that reads "Andrea Kelly" followed by a stylized flourish or initial.

Andrea Kelly
Vice President, Regulation

Enclosures